

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC., *et al.*,

Debtors.¹

Chapter 11

Case No. 20-33948 (MI)

Jointly Administered

Related Dkt. Nos.: 723, 724, 932

**NOTICE OF EXHIBITS AND WITNESSES TO BE OFFERED BY LEXON
INSURANCE COMPANY, IRONSHORE INDEMNITY INC. AND IRONSHORE
SPECIALTY INSURANCE COMPANY AT THE MARCH 24, 2021 HEARING**

Lexon Insurance Company, Ironshore Indemnity Inc. and Ironshore Specialty Insurance Company (collectively, “Lexon”), file this witness and exhibit list for the hearing scheduled for March 24, 2021 at 1:30 p.m. (prevailing Central Time) (the “Hearing”).

EXHIBITS

Lexon intends to offer the Indemnity Agreement attached hereto as **Exhibit “A”**, and attached as Exhibit “A” to the *Objection by Lexon Insurance Company, Ironshore Indemnity Inc. and Ironshore Specialty Insurance Company to the Motion of Debtors for Entry of Order; (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing; (II) Establishing Solicitation and Voting Procedures; (III) Scheduling Confirmation Hearing; (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed plan; (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (VI) Approving*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Procedures for Objections to the Assignment and Transfer of Property of the Estate; (VII) Approving Bid Submission Deadline and Procedures for Submission of Higher or Better Bids; and (VIII) Granting Related Relief [Dkt 932-1] at the Hearing. Further, Lexon reserves the right to introduce or rely upon any exhibit designated by the Debtors, or by any other party, and to introduce any exhibit, document, or information to rebut or impeach any statement or testimony. Lexon also reserves the right to rely on any pleadings or exhibits previously filed on the Court's docket.

WITNESS LIST

Lexon reserves the right to call and examine any witness designated by the Debtors, or by any other party. Lexon also reserves the right to call any witness required for rebuttal.

RESERVATION OF RIGHTS

Lexon reserves the right to seek to introduce any other testimony or exhibits or to supplement this disclosure as may be permitted by the Court.

Dated: March 22, 2021

Respectfully submitted,

/s/ Lee E. Woodard

Lee E. Woodard, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March 2021, a true and correct copy of the foregoing Exhibit and Witness List was served via the Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned case.

/s/ Lee E. Woodard

Lee E. Woodard